

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Connect America Fund)	WC Docket No. 10-90
)	

**REPLY COMMENTS OF
PIEDMONT RURAL TELEPHONE COOPERATIVE**

Piedmont Rural Telephone Cooperative (“PRTC”) welcomes the opportunity to provide input to the Federal Communications Commission (“FCC”) regarding the National Broadband Map and the Connect America Fund (“CAF”). PRTC respectfully submits these reply comments to assist the FCC with updating and correcting the data used to produce the National Broadband Map. The FCC “seeks comment on areas where coverage is either overstated (*i.e.*, by omission of unserved census blocks from the list) or understated (*i.e.*, census blocks listed as unserved when they are in fact served).”¹ PRTC has reviewed the shapefile map provided by the FCC in the December 5, 2012 Public Notice (DA 12-1961) and has identified census blocks within its service area that are incorrectly shown as unserved or partially unserved. PRTC respectfully requests that the FCC consider these inaccuracies and incorporate this information provided herein in a forthcoming update to the National Broadband Map.

PRTC is a rural incumbent local exchange carrier serving portions of Laurens, Abbeville, Union and Spartanburg Counties in South Carolina. PRTC provides DSL broadband service to every customer within its service territory at a minimum speed of 6 Mbps download, 1 Mbps upload (“6/1 Mbps”). PRTC believes that the National Broadband Map misidentifies census blocks within its service area as being unserved or partially unserved by a lower speed threshold

¹ See Wireline Competition Bureau Seeks Comment on Areas Shown as Unserved on the National Broadband Map for Connect America Phase I Incremental Support, WC Docket No. 10-90, Public Notice, DA 12-1961 (rel. December 5, 2012) (“December 5 Public Notice”).

than what PRTC provides (3 Mbps/768 kbps). PRTC understands that the version of the National Broadband Map used in the December 5 Public Notice relies on data from December, 2011. PRTC's network upgrade to 6/1 Mbps was completed in December of 2012, which may account for the inaccuracies in the National Broadband Map.² The Connect South Carolina map correctly shows all of PRTC's service territory in Laurens and Spartanburg Counties as served by at least 3Mbps/768kbps, whereas the FCC's map shows a number of unserved and underserved census blocks in PRTC's service territory (see Attachment 1).

PRTC believes the following census blocks contain errors. Maps of the census blocks which are entirely served by PRTC with broadband at speeds of at least 6/1 Mbps are included in Attachment 2.

CENSUS BLOCKS	CURRENT FCC REPORTED BROADBAND STATUS	AREA PARTLY COVERED BY ANOTHER PROVIDER	STATUS CHANGE 3MBx786K Minimum Available
450599805001	UNAVAIL	NO	YES
450830237001	PARTIAL	NO	YES
450599806001	PARTIAL	YES	YES
450599803003	PARTIAL	NO	YES
450599810001	PARTIAL	YES	YES
450599802004	PARTIAL	NO	YES
450599802002	PARTIAL	NO	YES
450599801001	PARTIAL	YES	YES

PRTC requests that the FCC consider the mapping inaccuracies described herein as it undergoes the process of updating the National Broadband Map to ensure the accurate distribution of CAF funding. PRTC believes that these corrections will help the FCC more accurately target CAF funding to unserved areas with the greatest need for broadband.

² The *December 5 Public Notice* states, "there may also be subsequent updates that commenters have already relayed to their state mapping entities (*e.g.*, a census block was unserved in 2011, but has since become services," and commenters are encouraged to report such changes.

Respectfully submitted,

Piedmont Rural Telephone Cooperative

/s/ *Randy Odom*

By: Randy Odom, CFO

January 24, 2013

Attachments

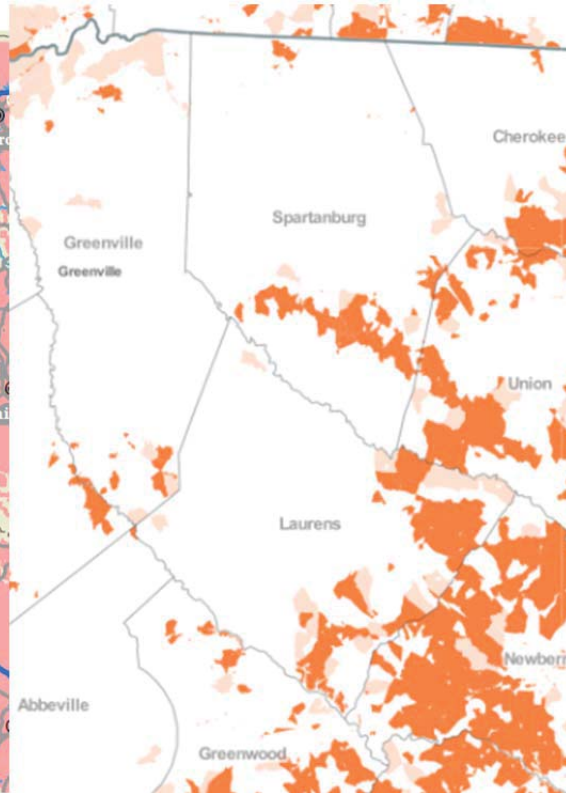
PIEDMONT RURAL TELEPHONE COOPERATIVE
ATTACHMENTS

ATTACHMENT 1:

PRTC has identified discrepancies between the National Broadband Map and the Connect South Carolina map for Laurens and Spartanburg Counties, where census blocks in its service area are incorrectly identified as unserved or partially unserved on the National Broadband Map.



Connect South Carolina



National Broadband Map

Attachment 2

The following maps show census tracts which are located completely or partially within PRTC's service territory. The National Broadband Map incorrectly shows these areas as unserved or partially unserved with 3Mbps/768kbps. PRTC provides 6/1 Mbps to all locations within its service territory.

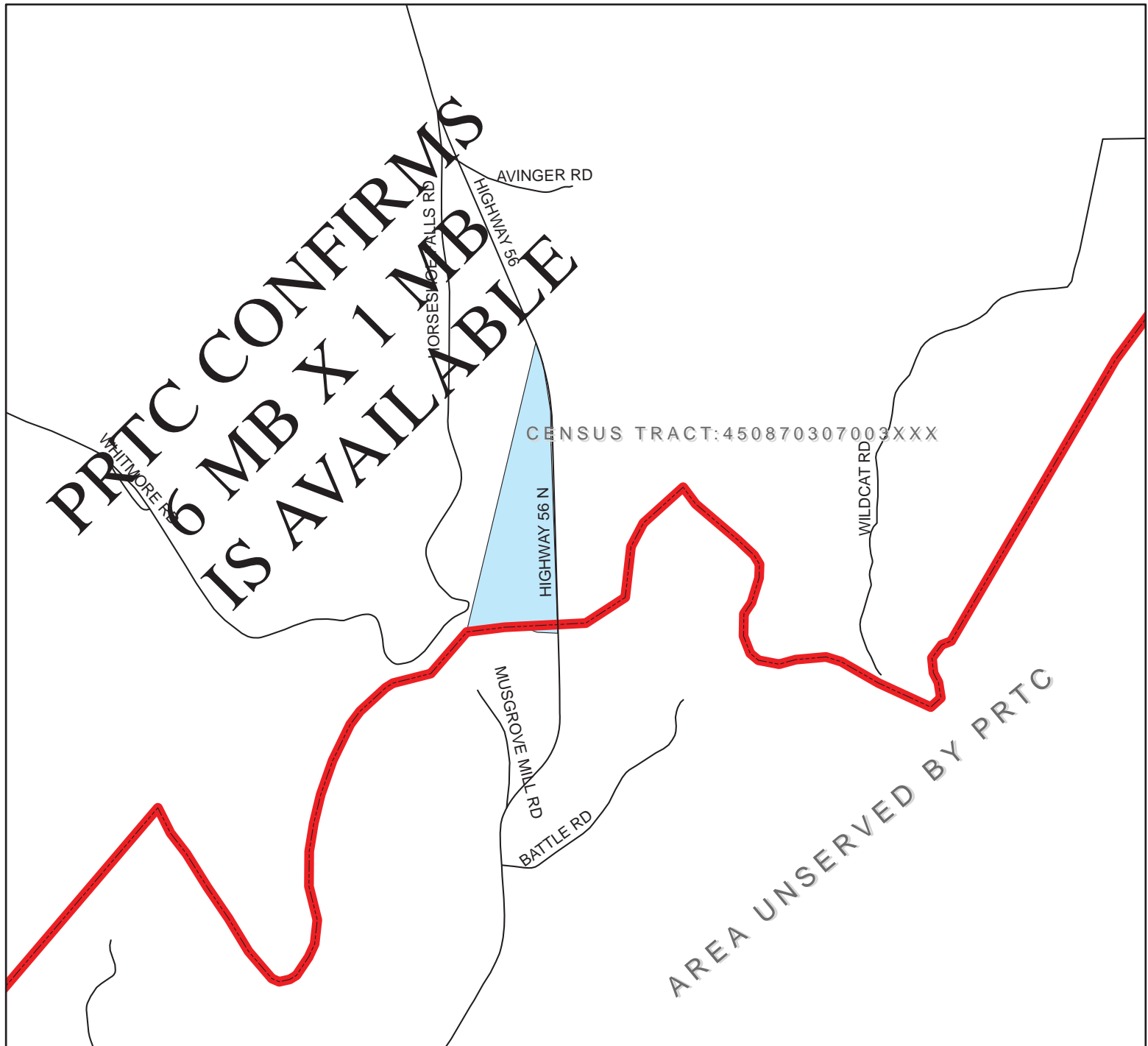
FCC PARTIAL
AVAILABILITY

SEVING AREA
BOUNDARY



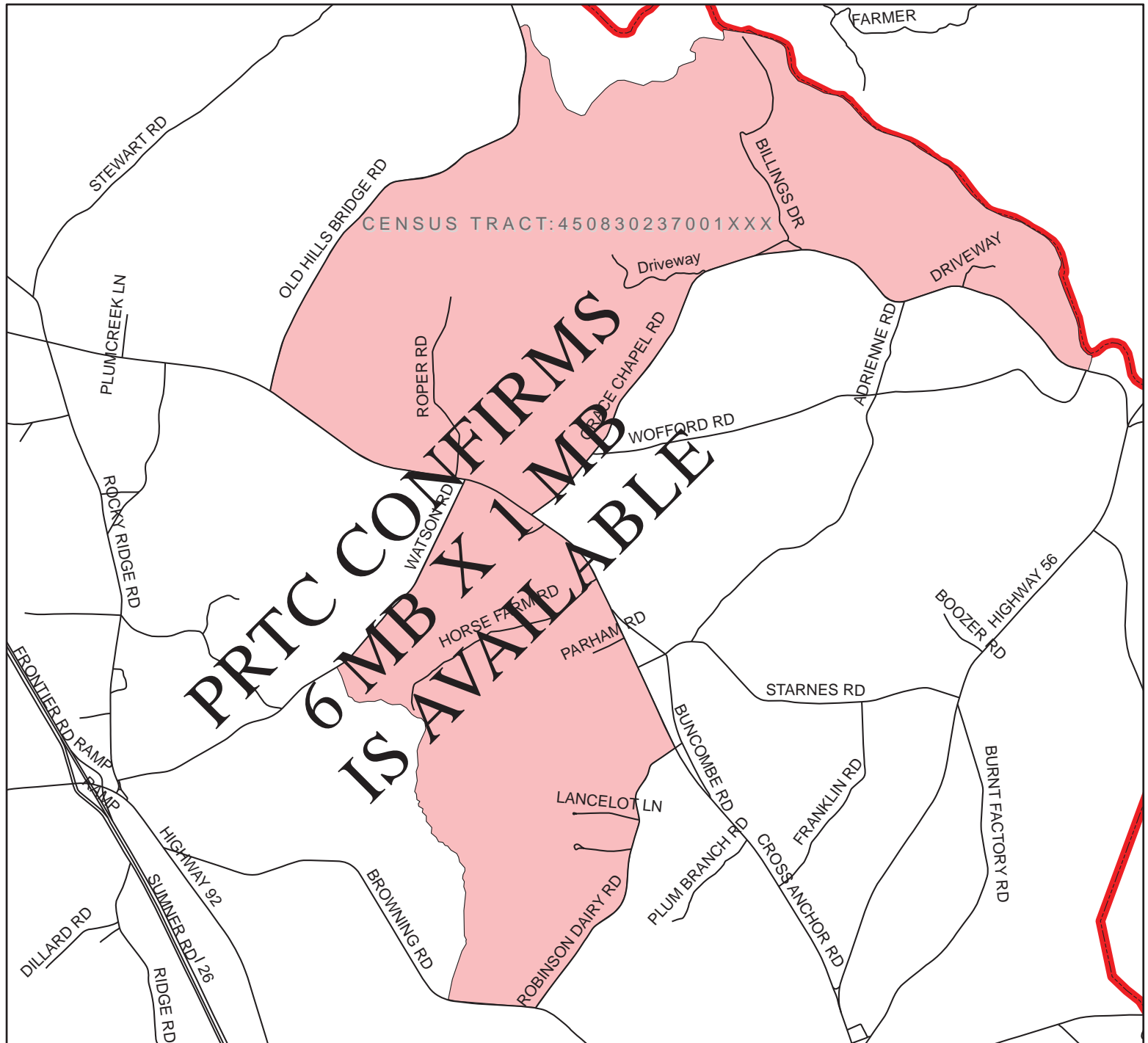


SERVING AREA BOUNDARY



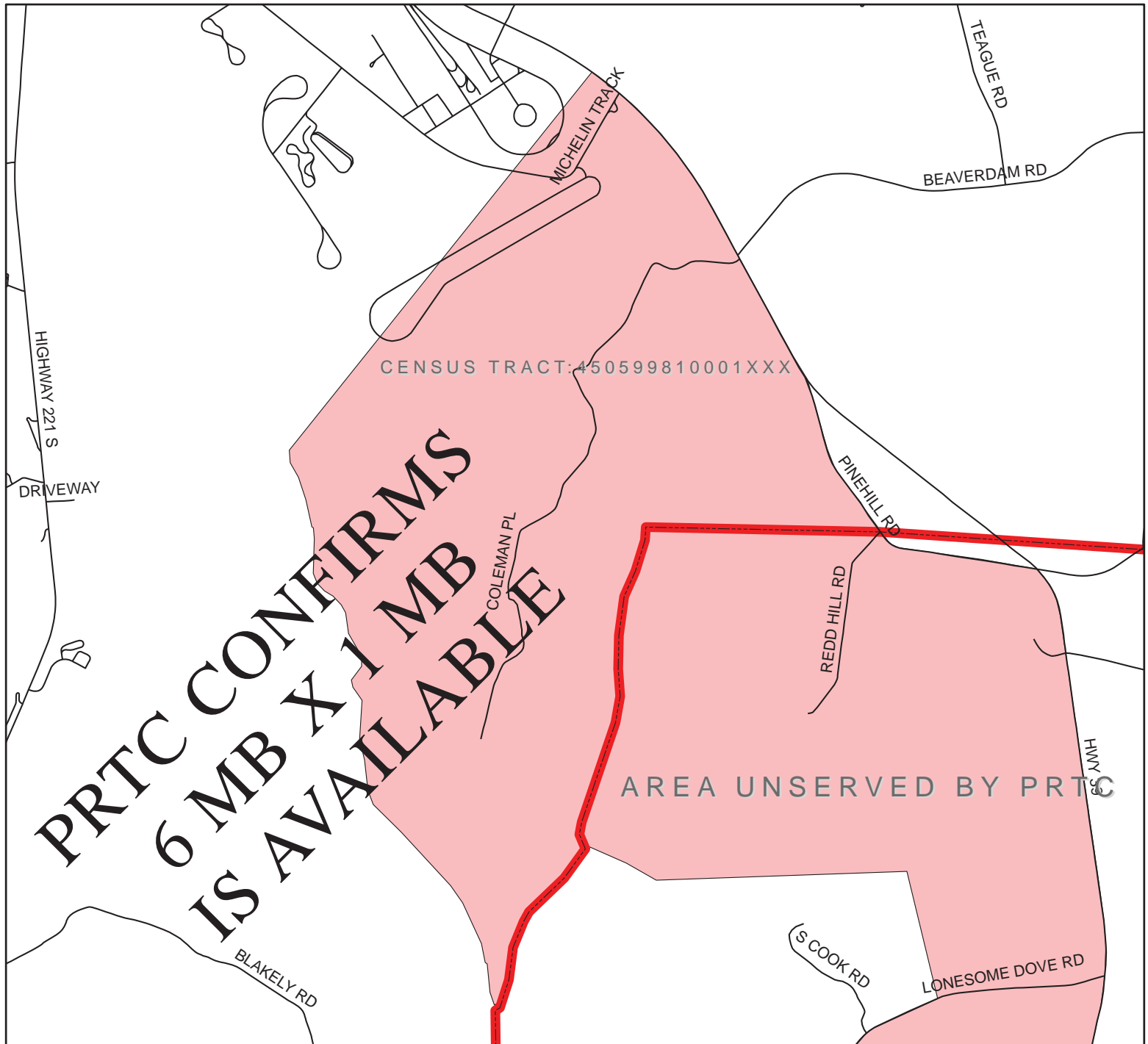
FCC PARTIAL
AVAILABILITY

SEVING AREA
BOUNDARY



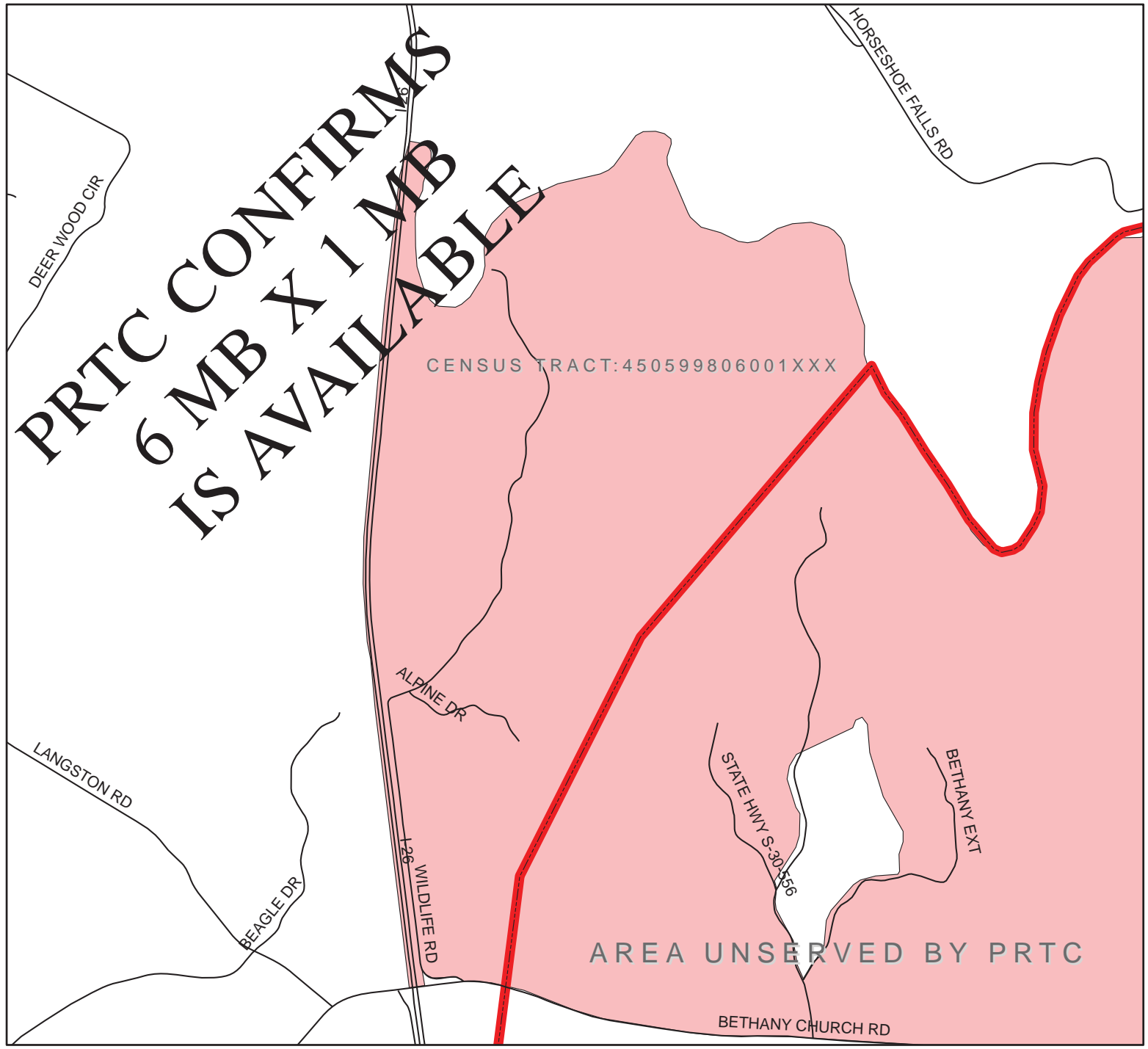
FCC PARTIAL
AVAILABILITY

SEVING AREA
BOUNDARY



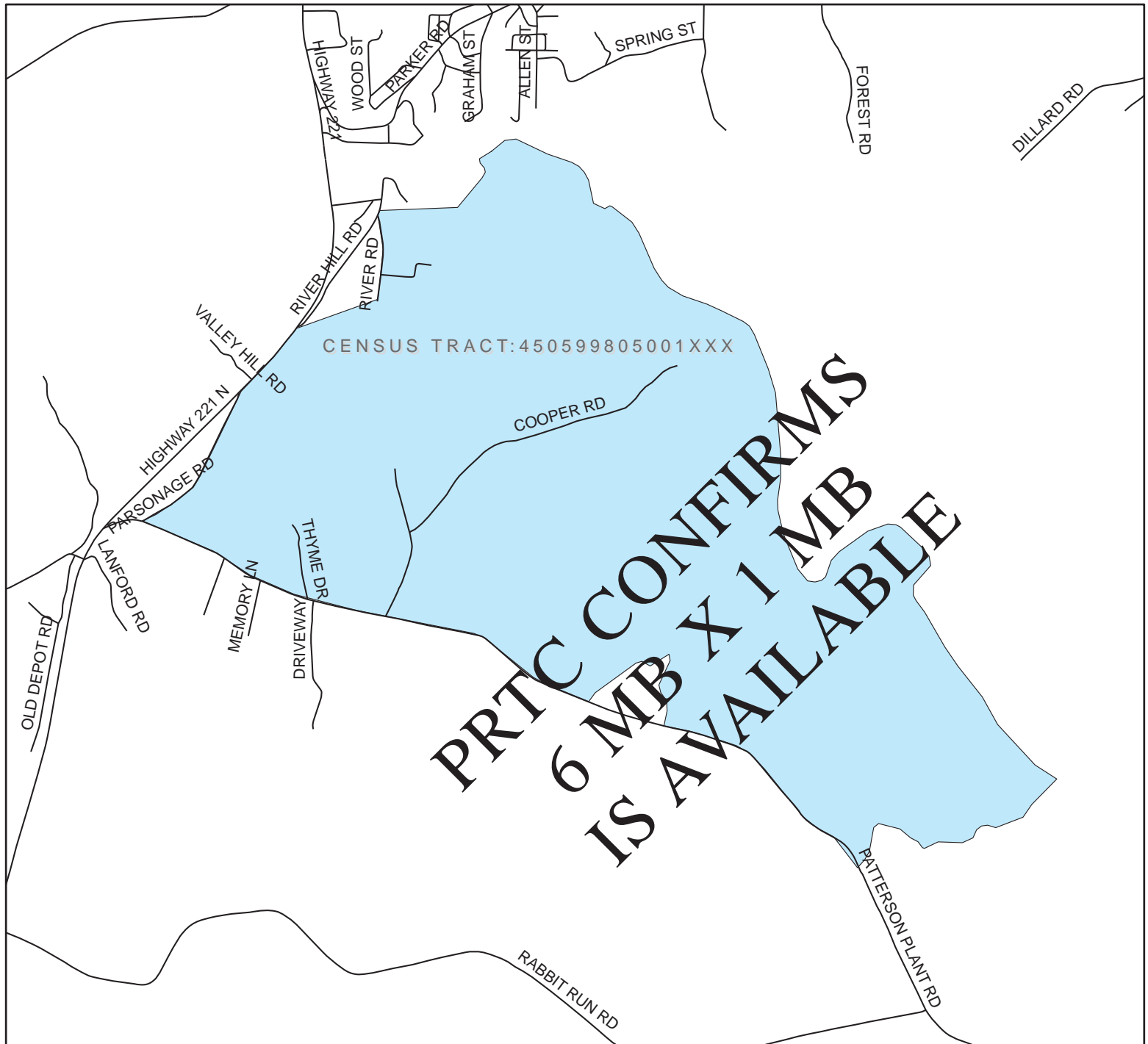
FCC PARTIAL
AVAILABILITY

SEVING AREA
BOUNDARY



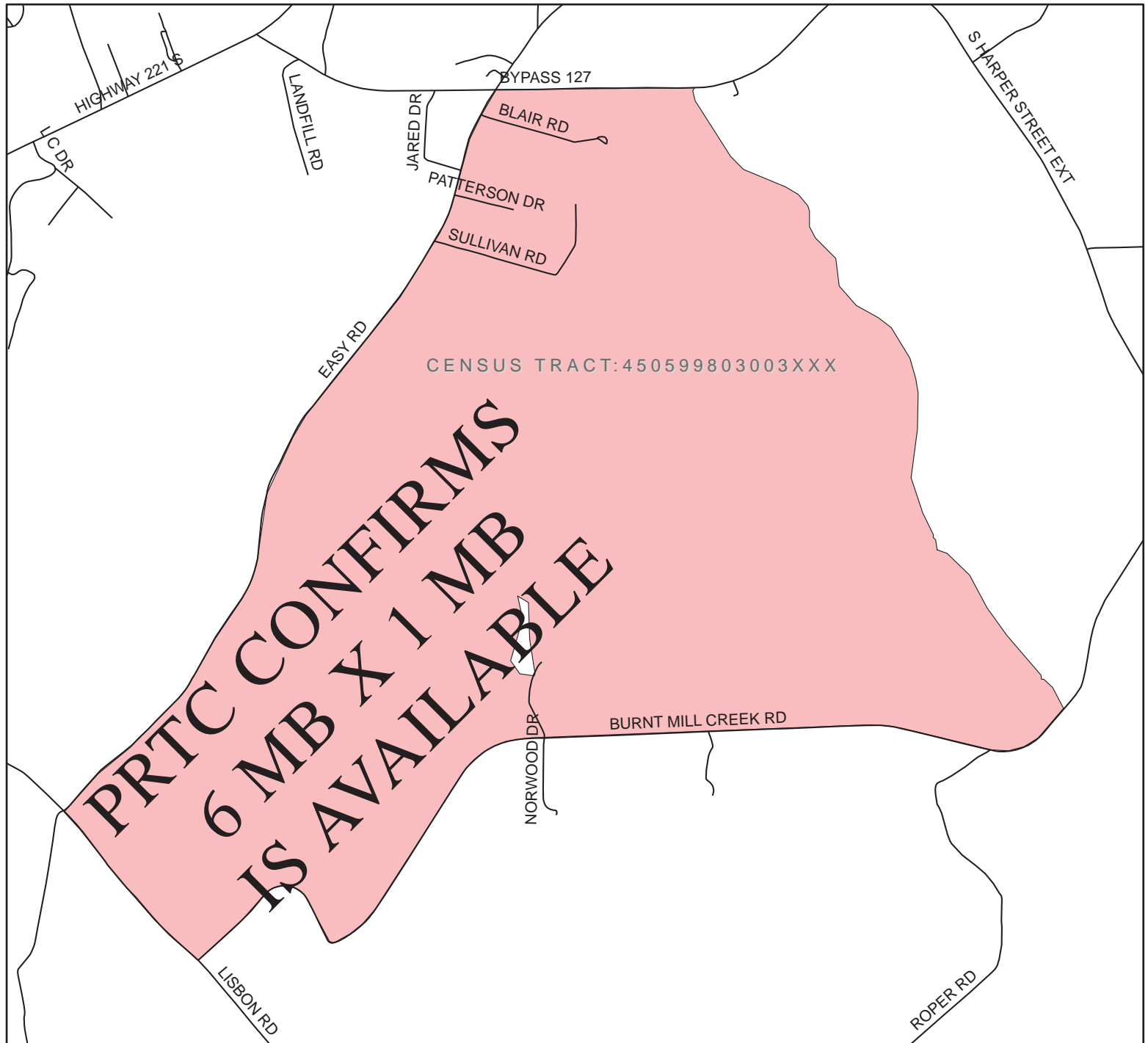
 FCC UNAVAILABLE

 SERVING AREA
BOUNDARY



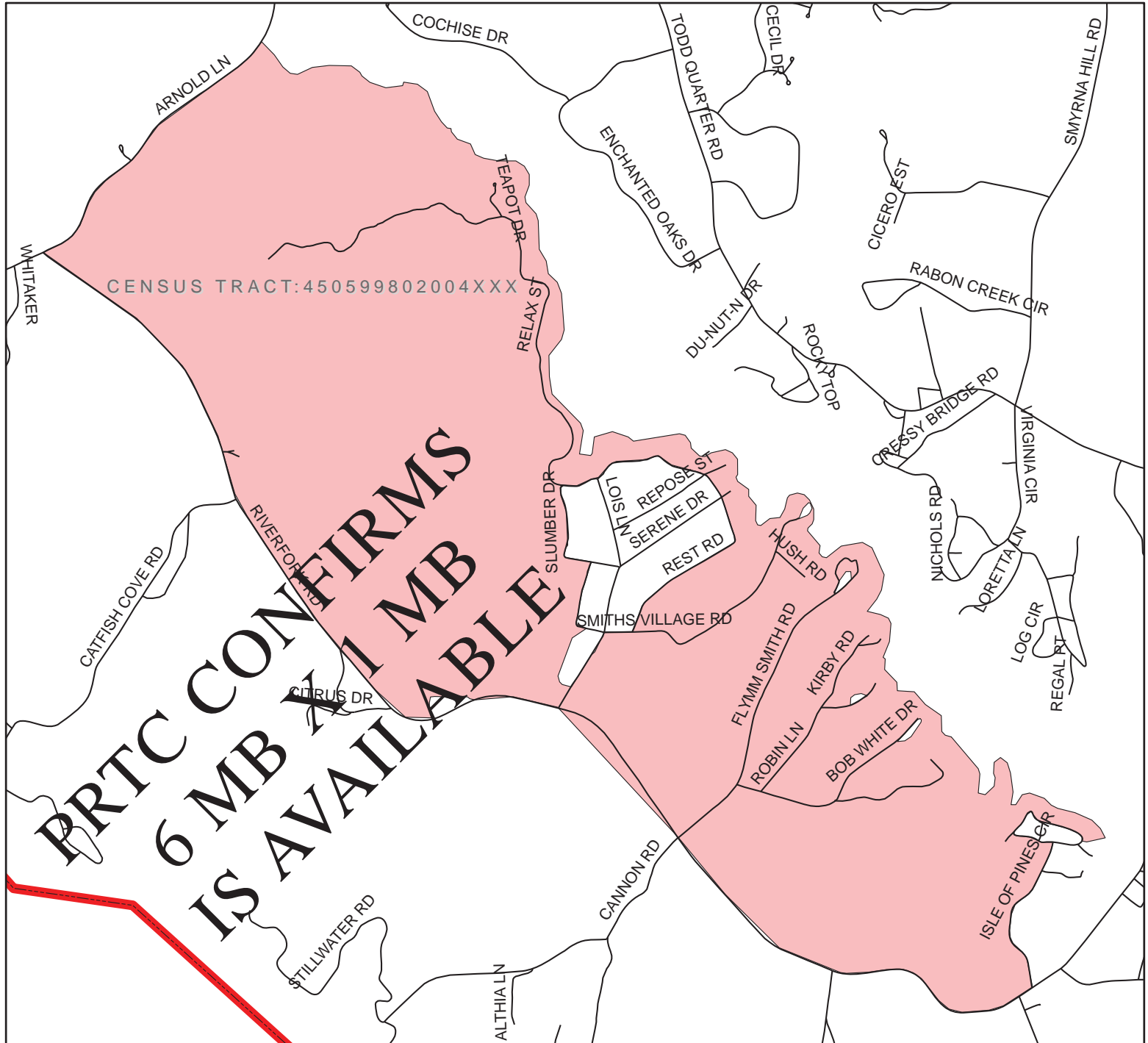
FCC PARTIAL
AVAILABILITY

SERVING AREA
BOUNDARY



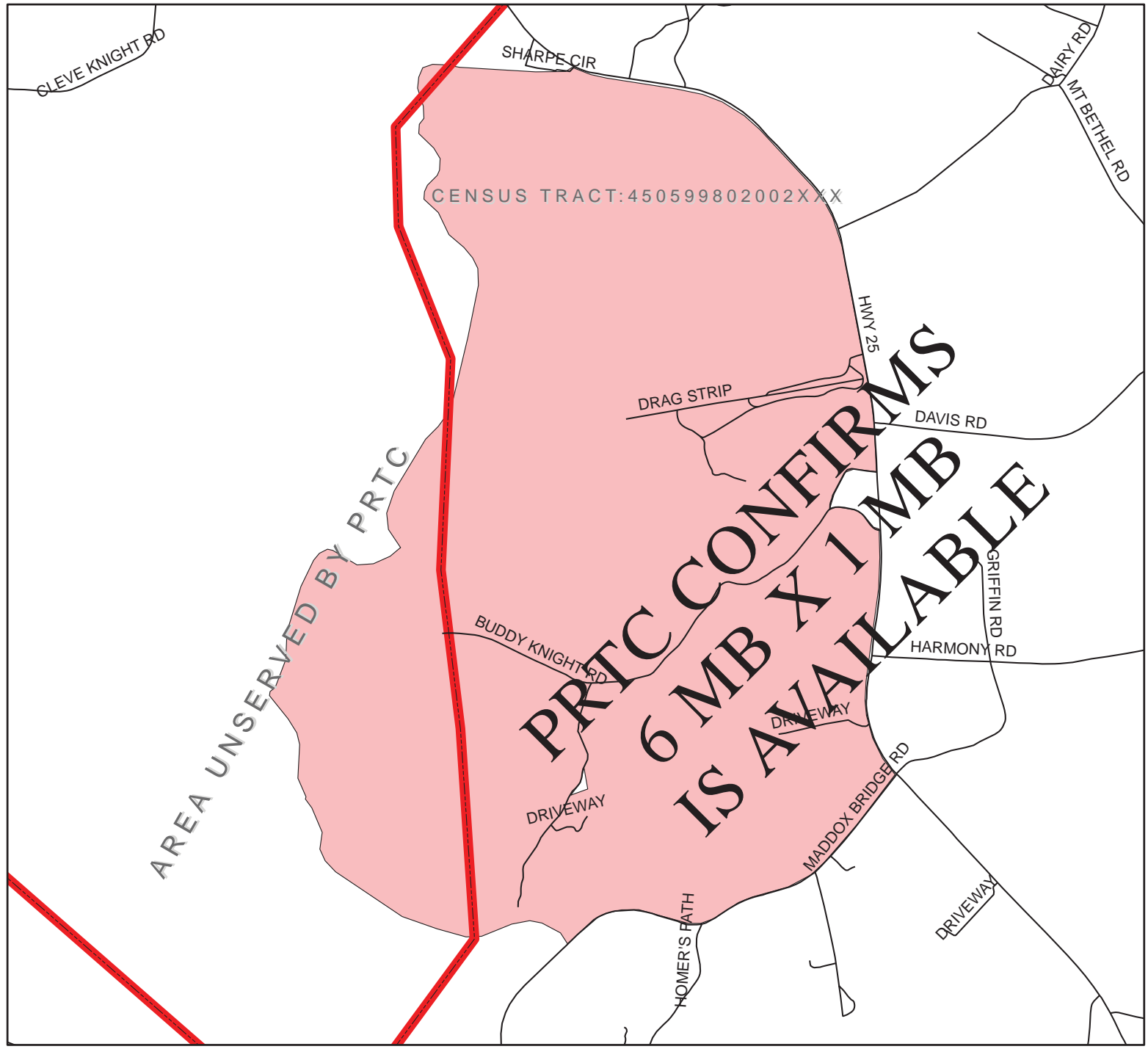
FCC PARTIAL
AVAILABILITY

SEVING AREA
BOUNDARY



FCC PARTIAL
AVAILABILITY

SEVING AREA
BOUNDARY



FCC PARTIAL
AVAILABILITY

SERVING AREA
BOUNDARY

